

1 Pamela M. Egan, WSBA No. 54736 (*pro hac vice*)  
2 POTOMAC LAW GROUP  
3 1300 Pennsylvania Ave. NW, Suite 700  
4 Washington, DC 20004  
5 Telephone: (415) 297-0132  
6 Facsimile: (202) 318 7707  
7 Email: pegan@potomacclaw.com  
8 *Attorneys for Mark D. Waldron, Chapter 11 Trustee*

7 **UNITED STATES BANKRUPTCY COURT**  
8 **EASTERN DISTRICT OF WASHINGTON**

9 In re:

10 GIGA WATT, Inc., a Washington  
11 corporation,

12 Debtor.

Case No. 18-03197 FPC 11

The Honorable Frederick P. Corbit

***AMENDED NOTICE OF  
TRUSTEE'S MOTION FOR  
ORDER: (I) SETTING EXPEDITED  
HEARING ON REQUEST FOR  
AUTHORITY TO RE-OPEN THE  
TNT FACILITY AND BORROW ON  
INTERIM BASIS; (II)  
AUTHORIZING RE-OPENING OF  
TNT FACILITY; AND (III)  
APPROVING FINANCING ON  
INTERIM AND FINAL BASIS WITH  
SUPER-PRIORITY UNSECURED  
STATUS***

**INTERIM HEARING TELEPHONIC**

Date: August 29, 2019

Time: 10:00 a.m.

Judge: Hon. Frederick P. Corbit

**TELEPHONIC CALL IN:**

**(509) 353-3183**

24 AMENDED NOTICE OF TRUSTEE'S MOTION TO RE-OPEN TNT  
25 FACILITY AND OBTAIN SUPER-PRIORITY CREDIT -- Page 1

1 **TO THE HONORABLE FREDERICK P. CORBIT, THE U.S. TRUSTEE,**  
2 **THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS AND ALL**  
3 **INTERESTED PARTIES AND THEIR ATTORNEYS OF RECORD:**

4 **PLEASE TAKE NOTICE THAT** on August 29, 2019 at 10:00 a.m., an  
5 interim hearing (the “Interim Hearing” will be held on the Motion filed by Mark  
6 D. Waldron, in his official capacity as the Chapter 11 Trustee (the “Trustee”)  
7 requesting an Order: (i) Setting Expedited Hearing on Request for Authority to  
8 Re-Open the TNT Facility and Borrow on an Interim Basis; (ii) Authorizing Re-  
9 Opening of TNT Facility, and (iii) Approving Financing on Interim and Final  
10 Basis With Super-Priority Unsecured Status. **The Interim Hearing will be held**  
11 **on the Court’s telephonic conference call in line: (509) 353-3183.** The Interim  
12 Hearing will not be held in the courtroom.

13 **PLEASE TAKE FURTHER NOTICE** that pursuant to 11 U.S.C.  
14 § 364(c)(1), the Motion seeks authority to borrow up to \$200,000 from Randy  
15 Michelson at an interest rate of 15% per annum, no compounding, and an  
16 origination fee of 4%.

17 **PLEASE TAKE FURTHER NOTICE** that pursuant to 11 U.S.C. § 363,  
18 the Trustee also seeks authority to re-open the Debtor’s crypto-mining facility  
19 located on 474 Highline Drive, East Wenatchee, Washington (the “TNT  
20 Facility”).

21 **PLEASE TAKE FURTHER NOTICE** that the Trustee is requesting a  
22 hearing on an expedited basis to re-open the TNT Facility and to allow the Trustee  
23 to borrow the sum of \$158,512 pending a final decision on the Motion. Shortened  
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1 notice is required on the Motion because every day that the TNT Facility remains  
2 closed is a day that the estate is not generating revenue even while administrative  
3 rent is accruing. Further, the Public Utility District No. 1 of Douglas County,  
4 Washington requires ten (10) days after payment of all funds owed in order to  
5 resume providing electricity to the TNT Facility.

6 **PLEASE TAKE FURTHER NOTICE** that any objection to the relief  
7 requested in the Motion, including the request to consider the Motion on  
8 shortened notice, must be served on undersigned counsel by email at  
9 [pegan@potomacclaw.com](mailto:pegan@potomacclaw.com) and filed with the Court on or before August 28, 2019,  
10 which is the day before the Interim Hearing. The Motion may be granted without  
11 further notice unless a written objection is timely served on undersigned counsel  
12 and timely filed with the Court.

13 **PLEASE TAKE FURTHER NOTICE** that the Motion, the proposed  
14 Order and the Super-Priority Unsecured Credit Agreement are enclosed herewith.  
15 The Trustee's memorandum and declaration in support of the Motion may be  
16 obtained from the Clerk of the Court whose address is set forth in the caption  
17 above.

18 Dated: August 23, 2019

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19  
20 By: /s/ Pamela M. Egan  
Pamela M. Egan (WSBA No. 54736)

21  
22 *Attorneys for Mark D. Waldron, Chapter 11  
Trustee*

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